

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,
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A Professional Corporation

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BY: /s/ Keith A. Bonchi
KEITH A. BONCHI, ESQ. (KAB3664)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE: : CHAPTER 11
: CASE NO. 10-44845
WALSH SECURITIES, INC. :
: JUDGE: NOVALYN L. WINFIELD
Debtor :

**NOTICE OF MOTION TO DISMISS BANKRUPTCY FOR FAILURE
TO FILE A PLAN UNDER 11 U.S.C. § 1112 AND FOR LACK
OF PROSECUTION OF THE BANKRUPTCY**

TO: Leonard C. Walczyk, Esq.
Wasserman, Jurista & Stolz, P.C.
225 Millburn Avenue, Suite 207
P. O. Box 1029
Millburn, NJ 07041
Atty. for Debtor, Walsh Securities, Inc.

PLEASE TAKE NOTICE that on **Monday, October 24, 2011 at 10:00 a.m.** in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for the creditor, Cherokee Equities, LLC shall move before the United States Bankruptcy Court, at the Court House, Newark, New Jersey for an Order Dismissing the within Bankruptcy.

Movant, shall rely upon the enclosed Statement of Counsel and the enclosed brief.

Movant requests oral argument in accordance with the local rules.

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DATED: September 29, 2011